

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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**In Re: A. Scott Bolden : Case No. 1:23-mc-00040-LKG**

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**PRECAUTIONARY MOTION OF A. SCOTT BOLDEN, RESPONDENT, FOR LEAVE  
TO FILE ANSWER TO SHOW CAUSE OF LONGER LENGTH THAN WOULD BE  
ALLOWED FOR MEMORANDA IN SUPPORT OF MOTIONS OR TRIAL BRIEFS**

A. Scott Bolden, Respondent, by his undersigned attorneys, moves the Court, as a Precaution, for Leave to File Answer to Show Cause of Longer Length Than Would Be Allowed for Memoranda in Support of Motions or Trial Briefs, and, in support thereof, states that:

1. The Show Cause Order that initiated this matter is in the nature of a complaint, i.e., a pleading that begins a new case.
2. Mr. Bolden's Answer is in the nature of a responsive pleading. The local rules impose no page limit to responsive pleadings.
3. Nonetheless, in an abundance of caution, counsel seeks leave to file the Answer in its current form, as it exceeds the page limitations imposed on memoranda in support (or in opposition) to motions or for trial briefs set forth in Local Rule 105.3 (incorporated into the criminal local rules through Local Rule 207).
4. In seeking this relief, Mr. Bolden asks the Court to consider that the potential imposition of criminal contempt is a serious matter affecting Mr. Bolden's reputation, liberty, and professional standing. Further, the issues discussed in the Answer concern the application of constitutional principles, the limits of the contempt power, and the interpretation of various applicable statutes, a Rule of Criminal Procedure and Local Rules. Most importantly, these issues

also include the significant question of whether, and to what extent, Congress has authorized punishment for failure to adhere to Local Rules.

5. To the extent that the Court might be of the view that the page limitations in Local Rule 105.3 might apply to the Answer it is nonetheless in the interest of justice to allow Mr. Bolden the opportunity to present these issues in full, as currently set forth in the Answer.

WHEREFORE, Mr. Bolden respectfully requests that the Court enter an Order approving the length of Mr. Bolden's Answer, submitted herewith, taking into consideration that the Answer is not expressly subject to the page limitations set forth in Local Rule 105.3.

Dated: February 10, 2023

Respectfully submitted,

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/s/  
Arnold M. Weiner, Bar No. 01605  
[aweiner@rwllaw.com](mailto:aweiner@rwllaw.com)  
Stuart A. Cherry, Bar No. 28012  
[scherry@rwllaw.com](mailto:scherry@rwllaw.com)  
Geoffrey W. Washington, Bar No. 25098  
[g washington@rwllaw.com](mailto:g washington@rwllaw.com)  
Devon L. Harman, Bar No. 21936  
[dharman@rwllaw.com](mailto:dharman@rwllaw.com)  
RIFKIN WEINER LIVINGSTON LLC  
2002 Clipper Park Road, Suite 108  
Baltimore, MD 21211  
Phone: (410) 769-8080  
Fax: (410) 769-8811

*Attorneys for A. Scott Bolden.*